

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

ANDRE THOMPSON, and BRYSON  
CHAPLIN,

Plaintiffs,

v.

CITY OF OLYMPIA, et al.,

Defendants.

CASE NO. C18-5267RBL

VERDICT FORM

We, the jury, answer the questions submitted by the Court as follows:

**Question 1:** Do you find that Officer Donald violated Andre Thompson's  
constitutional rights by using excessive force on May 21, 2015?

\_\_\_\_ Yes

☒ No

**Question 2:** Do you find that Officer Donald violated Bryson Chaplin's constitutional  
rights by using excessive force on May 21, 2015?

\_\_\_\_ Yes

☒ No

1       **Question 3:** Do you find that the City of Olympia's failure to train its officers was the  
2 moving force behind a violation of Andre Thompson's constitutional rights?

3               \_\_\_\_\_ Yes

                  \_\_\_\_\_ ☒ No

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5       **Question 4:** Do you find that the City of Olympia's failure to train its officers was the  
6 moving force behind a violation of Bryson Chaplin's constitutional rights?

7               \_\_\_\_\_ Yes

                  \_\_\_\_\_ ☒ No

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9       **Question 5:** Do you find that the City of Olympia's official policy, practice, or custom  
10 was the moving force behind a violation of Andre Thompson's constitutional rights?

11               \_\_\_\_\_ Yes

                  \_\_\_\_\_ ☒ No

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13       **Question 6:** Do you find that the City of Olympia's official policy, practice, or custom  
14 was the moving force behind a violation of Bryson Chaplin's constitutional rights?

15               \_\_\_\_\_ Yes

                  \_\_\_\_\_ ☒ No

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17       **Question 7:** Do you find for Andre Thompson on his negligence claim against Officer  
18 Donald and the City of Olympia?

19               \_\_\_\_\_ Yes

                  \_\_\_\_\_ ☒ No

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21       *If you answered Yes to Question 7, answer Question 8. If you answered No to Question 7,*  
22 *go to Question 10.*

**Question 8:** Do you find that Andre Thompson was contributorily negligent?

\_\_\_\_\_ Yes \_\_\_\_\_ No

*If you answered Yes to Question 8, answer Question 9. If you answered No to Question 8, go to Question 10.*

**Question 9:** What percentage of fault do you assign to Andre Thompson on the one hand, and to Officer Donald on the other? Your total should equal 100%.

Andre Thompson \_\_\_\_\_ %

Officer Donald \_\_\_\_\_ %

**Question 10:** Do you find for Bryson Chaplin on his negligence claim against Officer Donald and the City of Olympia?

\_\_\_\_\_ Yes \_\_\_\_\_ ☒ No

*If you answered Yes to Question 10, answer Question 11. If you answered No to Question 10, go to Question 13.*

**Question 11:** Do you find that Bryson Chaplin was contributorily negligent?

\_\_\_\_\_ Yes \_\_\_\_\_ No

*If you answered Yes to Question 11, answer Question 12. If you answered No to Question 11, go to Question 13.*

**Question 12:** What percentage of fault do you assign to Bryson Chaplin on the one hand, and to Officer Donald on the other? Your total should equal 100%

Bryson Chaplin \_\_\_\_\_ %

Officer Donald \_\_\_\_\_ %

1  
2 **Question 13:** Do you find for Andre Thompson on his outrage claim against Officer  
3 Donald and the City of Olympia?

4 ☐ Yes ☒ No

5 **Question 14:** Do you find for Bryson Chaplin on his outrage claim against Officer  
6 Donald and the City of Olympia?

7 ☐ Yes ☒ No

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9 *The presiding juror should date and sign this verdict form and advise the Court that you*  
10 *have reached a verdict.*

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12 Dated this 10<sup>th</sup> day of October 2019.

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15 PRESIDING JUROR  
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